

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES SECURITIES)	
AND EXCHANGE COMMISSION)	
)	
Plaintiff,)	
)	
v.)	Civ. No. 07-39-SM
)	
ERIC JAEGER and)	
JERRY A. SHANAHAN,)	
)	
Defendants.)	

**ASSENTED-TO MOTION FOR 4-DAY EXTENSION OF TIME IN WHICH TO
FILE OPPOSITION TO THE SEC'S SUMMARY JUDGMENT MOTION AND JERRY
SHANAHAN'S CROSS MOTION FOR SUMMARY JUDGMENT**

1. By this assented-to Motion, defendant Jerry A. Shanahan seeks a four-day extension of time up to and including December 16, 2011, in which to file his opposition to the SEC's motion for summary judgment and his cross motion for summary judgment.

2. Further, Mr. Shanahan and the SEC jointly request that the time in which the SEC has to respond to Mr. Shanahan's cross motion be extended from January 12, 2012, to and including January 16, 2012.

3. The reason for the requested short extension of time is that on December 8, 2011, undersigned counsel for Jerry Shanahan received an order to appear at a hearing on December 12, 2011 at 10:30 a.m. concerning an emergency motion for the return of property in the United States District Court for the District of Massachusetts, Springfield Division. See [3:11-mc-30018-MAP](#). The pleadings in the matter are sealed. Undersigned counsel's preparations for that emergency hearing and the round trip travel time between Boston and Springfield make it

impossible to complete Mr. Shanahan's summary judgment papers which are currently due on December 12, 2011.

4. Pursuant to Local Rule 7.1(c), undersigned counsel Andrew Good sought and received the assent of SEC Trial Counsel Nancy Gegenheimer who concurs with the relief sought in this motion.

5. Pursuant to Local Rule 7.1(a) (2) the requirement of a supporting legal memorandum is excused because the relief sought is within this Court's discretion.

Respectfully submitted,

Jerry A. Shanahan

By his attorneys,

/s/ Andrew Good

Andrew Good

/s/ Philip G. Cormier

Philip G. Cormier

Good & Cormier
83 Atlantic Avenue
Boston, MA 02110
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Dated: December 8, 2011

Certificate of Service

I hereby certify that a copy of the foregoing Motion was hereby served, via the ECF system, upon the following:

Nancy Gegenheimer, Esq.
Jonathan Shapiro, Esq.

DATED: December 8, 2011

/s/ Andrew Good

Andrew Good